



SOUTHWEST MARINE
OF SAN FRANCISCO, INC.

*3mcc.
Sari
Hoy*

"Specialists in the Repair,
Modernization and Maintenance
of Seagoing Vessels"

P.O. Box 7644 (Pier 28), San Francisco, CA 94120-7644
(415) 543-0499

Corporate Offices: San Diego

August 15, 1986
SWM#: AOR11356

AL S

HAZWASTE file

Supervisor of Shipbuilding,
Conversion and Repair, USN
San Francisco, CA 94124-2996

ATTN: Code 400

SUBJ: Contract N00024-84-C-8539
USS WICHITA (AOR-1); CLIN 0023
Hazardous Waste Disposal

REF: (a) SSSF ltr Ser 400/1033 of 01AUG86
(b) FONECON btwn M. Anderson, SWM/B. Reddy, SSSF
of 08AUG86

ENCL: (1) SWM ltr #A3870 of 10MAR86

Gentlemen:

Reference (a) states that the inactions of Southwest Marine to dispose of asbestos wastes removed from the USS WICHITA (AOR-1) are considered to be a violation of contractual obligations. Southwest Marine takes exception to the Supervisor's statement.

Prior to the start of subject PMA, Southwest Marine requested an EPA ID number for asbestos removal (enclosure (1)). The request was returned to us with no action having been taken. A representative from the U.S. EPA Region IX called and informed Southwest Marine that they no longer issue EPA numbers to private entities for the removal of hazardous wastes on Government contracts.

Historically, Southwest Marine had obtained disposal numbers on a one-time basis usage only and never had a permanent disposal number assigned. Additionally, the old permanent numbers assigned by EPA prior to 1986 were prefaced with the alphas "CAX". These numbers became no longer valid for use as of April 1, 1986; therefore, other yards could have used a "permanent" CAX number prior to April 1, 1986 for waste disposal regardless of contract type. Southwest Marine, having never had a CAX number, could not do so.

Southwest Marine, however, continued to pursue the matter to the State EPA Office in Sacramento. Point of contact was Mr. Larry Matz. Again, Southwest Marine was denied an EPA generator number.

Supervisor of Shipbuilding,
ATTN: Code 400
15 August 1986
Page Two

The Port Engineer of subject vessel (Mr. B. Matfin) also tried to assist Southwest Marine in obtaining a generator number to no avail.

It was through the cooperation of the ship's Commanding Officer that the ultimate disposal of the hazardous wastes was accomplished.

As stated above and discussed during reference (b), it is felt that Southwest Marine did all it could regarding the disposal of asbestos and in fact was not in violation of any contractual obligation. It is requested that the Supervisor rescind reference (a) at this time.

Please contact me should you have any questions regarding this matter.

Sincerely,



Karen Carissimi
Contracts Coordinator
SOUTHWEST MARINE of
SAN FRANCISCO, INC.

Enclosure

cc: SWMSF
B. McKay
M. Anderson
B. Gair